

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
GREENEVILLE DIVISION

ULTIMA SERVICES CORPORATION,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 2:20-cv-00041-DCLC-CRW
	)	
U.S. DEPARTMENT OF AGRICULTURE,	)	
et al.,	)	
	)	
Defendants.	)	

**JOINT MOTION TO EXTEND TIME TO FILE DISPOSITIVE MOTIONS  
AND DAUBERT CHALLENGES**

Plaintiff Ultima Services Corporation and Defendants United States Department of Agriculture, the Secretary of Agriculture, the United States Small Business Administration, and the Administrator of the United States Small Business Administration (collectively, the “Parties”) jointly request that the Court extend the time to file dispositive motions, Daubert challenges, and responses to Daubert challenges, as set forth in the Scheduling Order entered on April 9, 2021. ECF No. 34. In support of this Motion, the Parties state as follows:

1. On March 17, 2022, the Parties agreed in writing to extend the discovery deadline from April 28, 2022 to May 6, 2022 for Plaintiff to complete expert discovery.
2. The Parties are in the midst of discovery and have agreed to further extend the deadline from May 6, 2022 to May 20, 2022, so that Plaintiff may complete depositions of additional witnesses.
3. Given the complexities of the issues presented in this matter and to ensure that the parties have sufficient time after the close of discovery to receive deposition

transcripts and prepare dispositive motions and Daubert challenges, the parties request that the Court extend the deadline for filing dispositive and Daubert motions from June 6, 2022 to June 21, 2022. Consequently, the parties also request that the Court extend the time to file responses to any Daubert motions from June 20, 2022 to July 5, 2022.

4. If granted, this extension will not have an effect on any other deadlines set in the Scheduling Order, including the dates for non-dispositive motions, the final pretrial conference, and trial.

5. A proposed Order is attached.

THEREFORE, the parties request that the Court grant this Motion and enter the attached proposed Order.

Dated: May 4, 2022

Respectfully submitted,

KAREN WOODARD  
Chief  
Employment Litigation Section  
Civil Rights Division  
United States Department of Justice  
ANDREW BRANIFF (IN Bar No. 23430-71)  
Deputy Chief

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**CERTIFICATE OF SERVICE**

I hereby certify that on May 4, 2022, I electronically filed the above document and attached proposed Order with the Clerk of the Court using the ECF System, which will send notification of such filing to all counsel of record.

/s/ K'Shaani Smith

K'Shaani Smith  
Senior Trial Attorney